

Exhibit “D”

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**FEDERAL BUREAU OF INVESTIGATION**
Electronic Communication

Title: (U) To provide information to Albany
Division

Date: 11/18/2019

From: CRIMINAL INVESTIGATIVE
SQUAD - 1

Contact: Jessica L. Diggons, [REDACTED]

Approved By: SUPV MARY ELLEN SMITH

Drafted By: Jessica L. Diggons

Case ID #: [REDACTED] (U) Tor hidden service site Boy Vids 4.0

Synopsis: (U) To provide information to Albany Division regarding a dark web VCAC subject.

Administrative Notes: (U) On 12/2/2019, CACHTU and CEOU will hold a conference call with field PCORs to discuss this operation. Offices receiving leads prior to this conference call should not wait if they are prepared to take action.

Enclosure(s): Enclosed are the following items:

1. (U) Charter subpoena results (Delaney)
2. (U) PRTT pony
3. (U) Search warrant template

Details:

[REDACTED] is being conducted by the Federal Bureau of Investigation (FBI), Criminal Investigative Division (CID), Violent Crime Section (VCS), Child Exploitation Operational Unit (CEOU), targeting users of multiple Tor hidden service sites; to include [REDACTED] Boy Vids 4.0, [REDACTED].

Target Site

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Boy Vids 4.0 was a Tor-network-based website that functioned as an active online forum whose primary purpose was to be a board "public, open and free, however, slightly moderate (d) to avoid things that are harmful to the community and / or members, here you can be happy, be yourself and can talk about anything, even controversial issues, but always respecting the rights of other members." The website was dedicated to the sexual exploitation of minor and/or prepubescent males. The advertisement and distribution of child pornography were regular occurrences on this site. The website launched in approximately 2013 and ceased operating in June 2019. The site allowed users to engage in online communication with other users, either within forums that were openly accessible to any user of the site, within forums only accessible to particular users, or in one-to-one private message chats between two users.

Upon entry to the site, users were presented with "announcement," "rules," "allowed hosts," "videos," and "photos" sections. The "video" and "photo" sections offered links to topics such as "hardcore," "adolescents," "toddlers," "spycam," "soft hurtcore." There were descriptions of each topic such as the description for "toddlers" was "0-4 years", "Fetish" was "cross-dressing, diaper, scat, zoo, etc," and "soft hurtcore" was "fighting, wresting, bondage, spanking, etc."

The Tor Network

The Tor Network is a computer network available to Internet users designed specifically to facilitate anonymous communication over the Internet. The Tor Network attempts to do this by routing user communications through a globally distributed network of intermediary computers, or proxies, along a randomly assigned path known as a "circuit." Because of the way the Tor Network routes communication through proxy computers, traditional IP address-based identification techniques are not effective.

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To access the Tor Network, a user must install Tor software either by downloading an add-on to the user's web browser or by downloading the free "Tor browser bundle," which is available at www.torproject.org. When a Tor user accesses a website, only the IP address of the last relay computer (the "exit node"), as opposed to the user's actual IP address, appears on the website's IP address log. Currently, there is no practical method to trace a user's actual IP address back through those Tor relay computers.

The Tor Network also makes it possible for users to operate websites called "hidden services," in a manner that attempts to conceal the true IP address of the computer hosting the website. Hidden service websites are accessible only to users operating within the Tor network. Like other websites, hidden services are hosted on computer servers that communicate through IP addresses. However, hidden services have unique technical features that attempt to conceal the computer server's location.

Intelligence

In August 2019, the FBI received information from a foreign law enforcement agency (FLA) known to the FBI with a history of providing reliable, accurate information in the past. The FLA obtained the information using methods that were legal in that country. Furthermore, the FLA did not access any devices in the United States in order to provide this information. The FLA identified an IP address of a user who accessed the site Boy Vids 4.0 on April 22, 2019 at 02:41:28 UTC. The IP address was 69.206.190.157 and, according to publicly available information, was owned/operated by Charter Communications.

Information on Potential Target

On September 5, 2019, an administrative subpoena was issued to Charter Communications for information related to IP address 69.206.190.157 on

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April 22, 2019 at 02:41:28 UTC. On September 10, 2019, Charter Communications provided the following subscriber information (refer to 305A-HQ-3196371-SBP Serial 53):

Name: Jacob Delaney
Address: 144 Main Street, Apt 311, New Paltz, New York 12561
Telephone: (631) 972-8924
Email: delaneyj3@hawkmail.newpaltz.edu
Account Number: 8150300130228237

Analyst note: The email domain hawkmail.newpaltz.edu appears to correspond to The State University of New York at New Paltz (SUNY New Paltz), suggesting Jacob Delaney was previously or is currently a student at the university. Additionally, the above address appears to correspond to Paltz Commons, an apartment complex located approximately .4 miles away from the university. Based on open source reporting, it appears Paltz Commons is a popular off-campus housing option for students of the university.

An ICACCOPS database query for IP address 69.206.190.157 yielded negative results.

A NCMEC database search for IP address 69.206.190.157 yielded negative results.

An Accurant search for 144 Main St Apt 311, New Paltz, NY 12561-1153 identified the following resident: Danielle Bettio (DOB: 11/10/1998; SSN: 742-70-7054). An Accurant search for Jacob Delaney residing at this address yielded negative results.

An Accurant search for Jacob Delaney in New Paltz, NY yielded the following information:

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Investigative Support

This lead is being forwarded for whatever action is deemed appropriate to include partnering with or referral to local law enforcement.

A draft search warrant affidavit and a pen register/trap and trace pony are attached. A PRTT can be effective in determining whether Tor network traffic is coming from a residence. Please refer to [REDACTED] [REDACTED] for Accurant reports, DMV records, NCIC records, and other related documents.

If the subject reveals usernames on a Tor hidden service and the case agent seeks further information related to this type of activity, please contact the POCs referenced below for access to or information from databases at their disposal.

Should Albany Division obtain consent to take over the subject's hidden service accounts but does not have the interest or capacity, CEOU would be interested in those accounts.

The local United States Attorney's Office (USAO) can contact [REDACTED]

[REDACTED] for advice and assistance if needed.

Please contact Special Agent Jessica Diggon [REDACTED] or Special Agent David J. Backlund [REDACTED] with any questions.

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